

**IN THE UNITED STATE BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	)	Chapter 11
	)	
W.R. GRACE & CO., <i>et al.</i> ,	)	Case No. 01-1139 (JFK)
	)	
Debtors.	)	Jointly Administered
	)	
	)	<b>Objection Date: January 5, 2007 @ 4:00 p.m.</b>
	)	<b>Hearing Date: January 23, 2007 @ 8:30 a.m.</b>
		<b>Before the Honorable Judith K. Fitzgerald, U.S.</b>
		<b>Bankruptcy Court, 824 Market Street, Wilmington, DE,</b>
		<b>19801</b>

**NOTICE OF MOTION**

TO: All Parties on the Attached List

PLEASE TAKE NOTICE, that on December 18, 2006, the Official Committee of Asbestos Personal Injury Claimants (the “Committee”) filed and served the attached **Motion of the Official Committee of Asbestos Personal Injury Claimants to Compel Debtors’ Production of Certain Actuarial Studies Referenced in Their Securities Filings** (the “Motion”) with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 5<sup>th</sup> Floor, Wilmington, Delaware 19081. The Motion seeks entry of an order compelling the Debtors to produce or permit the inspection of all actuarially-based estimates of asbestos personal-injury claims that are referenced in the 2005 Form 10-K that Debtors filed with the U.S. Securities & Exchange Commission.

PLEASE TAKE FURTHER NOTICE, that any responses to the Motion must be in writing and filed with the Bankruptcy Court on or before **January 5, 2007 at 4:00 p.m.**

PLEASE TAKE FURTHER NOTICE, that at the same time, you must also serve a copy of the response upon the undersigned counsel, so that it is received on or before **January 5, 2007 at 4:00 p.m.**

A HEARING ON THE MOTION WILL BE HELD, only if a timely objection is filed, on **January 23, 2007 at 8:30 a.m.** before the Honorable Judith K. Fitzgerald, United States Bankruptcy Judge, United States Bankruptcy Court, 824 Market Street, Wilmington, DE, 19801.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF DEMANDED BY THE MOTION WITHOUT FUTHER NOTICE OR HEARING.

Dated: December 18, 2006

CAMPBELL & LEVINE, LLC

*/s/ Marla R. Eskin*

Marla R. Eskin (No. 2989)  
Mark T. Hurford (No. 3299)  
800 North King Street, Suite 300  
Wilmington, DE 19801  
(302) 426-1900

-and-

CAPLIN & DRYSDALE, CHARTERED  
Elihu Inselbuch  
399 Park Avenue  
New York, NY 10022-4614  
(212) 319-7125

-and-

CAPLIN & DRYSDALE, CHARTERED  
Peter Van N. Lockwood  
Nathan D. Finch  
Walter B. Slocombe  
One Thomas Circle, N.W.  
Washington, D.C. 20005  
(202) 862-5000

*Counsel to the Official Committee of Asbestos  
Personal Injury Claimants*